

HON. JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON (SEATTLE)

ANGELO DENNINGS, et. al,

Plaintiffs,

v.

CLEARWIRE CORPORATION,

Defendant.

NO. C10-1859-JLR

DECLARATION OF  
JAN PETRUS

Jan Petrus declares under penalty of perjury that the following is true and correct to the best of her knowledge, information and belief:

1. I have been employed by Mr. Bandas since May 2005 and was hired by him as his legal assistant in what was then the firm of Bandas & Laws, P.C. When that predecessor law firm became Bandas Law Firm, P.C. in approximately August 2005, I assumed responsibility as office manager for handling and managing the firm's finances, including but not limited to paying vendors, handling the firm's trust account, making distributions from the trust account, paying payroll, managing the firm's banking matters, getting financial data to and reports from the firm's outside accountants, and generally all manner of the firm's financial affairs. I have check signing authority on all of the law firm's accounts. I am also responsible for maintaining and using the firm's accounting software. I am charged with these responsibilities by Mr. Bandas. Of course, he makes the ultimate financial decisions for the firm, but I am charged with handling the details of those decisions and executing on those decisions.
2. I was on a camping vacation in Concan, Texas with my daughter and her family starting July 13, 2013 and returned to Corpus Christi on July 21, 2013. During that week, Mr. Bandas did not call me about any firm matters and I did not talk to him during my vacation. When I learned after my return to Corpus Christi that the Court issued a show

DECLARATION OF  
JAN PETRUS - 1

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1 cause order for failing to post the \$41,150 bond, I wish he had contacted me while I was  
2 on vacation.

- 3 3. Although I was out of town, I likely could have made the necessary financial  
4 arrangements remotely for the firm to have been able to send a check to the Court. It  
5 would not have been easy. I was in a relatively remote location and cell phone coverage  
6 was intermittent. I likely would have had to drive somewhere to find better coverage and  
7 internet access.
- 8 4. Regardless, whether I did it remotely, or from Corpus Christi, I would have had to be the  
9 one to do it. Mr. Bandas does not know how to operate or use the firm's accounting  
10 software and he has not issued any checks on behalf of the firm since I took over as office  
11 manager.

12 DATED this 14<sup>th</sup> day of August, 2013, in Corpus Christi, Texas.

13   
14 Jan Petrus